

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-897

IN RE:

CAMP LEJEUNE WATER LITIGATION

This Document Relates To:

ALL CASES

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**SETTLEMENT MASTER  
STATUS REPORT**

**SECOND STATUS REPORT TO THE COURT RE:  
CAMP LEJUENE WATER LITIGATION SETTLEMENT STRATEGY  
BY SETTLEMENT MASTERS THOMAS J. PERRELLI (JENNER & BLOCK, LLP)  
AND CHRISTOPHER G. OPRISON (DLA PIPER LLP (US))**

Pursuant to Fed. R. Civ. P. 16(a)(5), 16(c)(2)(H), and 53, this Court appointed Settlement Masters Thomas J. Perrelli of Jenner & Block, LLP and Christopher G. Oprison of DLA Piper LLP (US) on July 9, 2024 to facilitate the development of a global settlement framework between the parties, the Department of Justice (“DOJ”) and the Plaintiffs’ Leadership Group (“PLG”) (collectively the “Parties”), for all outstanding claims brought under the Camp Lejeune Justice Act (“CLJA”). Pursuant to direction of the Court, the Settlement Masters are filing the attached status memo as *Exhibit A*. As set forth therein, the Parties agree to the process outlines in the attached status memo and the Parties’ most recent, ongoing discussions and are committed to participating in global settlement discussions in good faith based on the information resulting from that process.

*[Signatures follow on next page.]*

DATED this 16th day of June, 2025.

Respectfully submitted,

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*Settlement Masters*

# EXHIBIT A

## REPORTING MEMORANDUM

TO: The Court  
FR: CLJA Settlement Masters  
CC: Plaintiffs' Leadership Group  
U.S. Department of Justice  
DATE: June 16, 2025  
RE: Settlement Master June 2025 Update: *In Re Camp Lejeune Water Litigation*,  
Case No. 7:23-cv-897

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### I. INTRODUCTION

- On March 21, 2025, the Court-appointed joint Settlement Masters Thomas J. Perrelli of Jenner & Block, LLP and Christopher G. Oprison of DLA Piper LLP (US) (together, “SMs”) filed a status report regarding the settlement process to date. This subsequent report is intended to address the efforts undertaken since that time by the SMs and the parties, the Department of Justice (“DOJ”) and the Plaintiffs’ Leadership Group (“PLG”) (collectively the “Parties”).
- The SMs continue to work diligently with the Parties to resolve as many claims as possible outside of traditional adjudication. In pursuit of this goal, the Parties have agreed to utilize a questionnaire and bellwether mediation, *inter alia*, to inform the development of a settlement matrix that may be applied to resolve a number of qualifying claims.

### II. STATUS OF DISCUSSIONS WITH PARTIES

- The SMs continue to meet with the Court’s Settlement Liaison, the Hon. James Gates, on a weekly basis.
- The SMs have also been in regular communication with the Parties, both via email and teleconference. The SMs met with the DOJ on April 17 and 25, 2025 and with both Parties on May 2 and 9, 2025.
- In addition to working with the SMs towards the collective goal of settlement, and at the urging and encouragement of the SMs, the Parties have been in direct communication with each other to finalize the substance of and process related to the questionnaire as well as the details of the upcoming mediations.

### III. SETTLEMENT STRATEGY DEVELOPMENT

- As described in the March 21, 2025 Status Report, the SMs continue to work with the Parties to (i) develop and disseminate a questionnaire, (ii) mediate a subset of pending claims, and (iii) seek resolution of discrete legal issues, as needed, to inform the development of a matrix.

- The Parties have agreed upon the process for extracting a random (and representative) sample of claimants who will receive the questionnaire. The Parties have also agreed on the universe of injuries/conditions that will be the focus of the questionnaire and that the responses from the sample of claimants for the questionnaire will serve as a basis to negotiate a global resolution. The Parties are finalizing the identification of the questionnaire respondents.
- The Parties have agreed to mediate all twenty-five (25) of the pending Track 1 bellwether cases. Judge Gates and the SMs will serve as the mediators. The Track 1 bellwether cases share common injuries/conditions and, for purposes of facilitating an efficient mediation process, will be grouped into six (6) categories and mediated together, specifically:
  1. Acute Leukemia;
  2. Chronic Leukemia;
  3. Bladder Cancer;
  4. Kidney Cancer;
  5. Non-Hodgkin's Lymphoma; and
  6. Parkinson's Disease.
- Each mediation will be led by one of the three mediators and supported by one of the remaining two.
- Subject to finalizing scheduling, the intent is for the mediations to begin in late July and conclude by late August. The SMs and Judge Gates will provide the Court with the specific dates for each grouping once they are finalized.
- The negotiations for the settlement matrix will begin after the mediations and questionnaire processes have concluded.

#### IV. CONCLUSION

- The SMs and Parties continue to work toward finalizing a matrix and global settlement framework for resolving a significant portion of the present claims by the end of 2025. The SMs commend the Parties on their continued commitment to working expeditiously to achieve this goal.

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